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Cc: CN=Stephanie Skophammer/OU=R9/O=USEPA/C=US@EPA[]
From: CN=Carolyn Yale/OU=R9/O=USEPA/C=US
Sent: Fri 1/20/2012 5:20:05 PM
Subject: Re: Interesting item about BDCP WQS analysis

I'm trying to understand this. There seem to be a couple of ways of measuring and comparing and evaluating. Compliance (or not) with an objective defined by specific parameters at a specific place is not the same as evaluation of changes for NEPA or CEQA analysis, using a baseline of conditions absent the proposed project. It seems that they may have cut (NEPA) corners by looking at the issue from the objective/compliance perspective.

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Interesting item about BDCP WQS analysis

Erin Foresman to: Karen Schwinn, Tom Hagler, Stephanie Skophammer, Bruce Herbold, Tim Vendlinski, Carolyn Yale, Tim Vendlinski 01/20/2012 08:41 AM

Hi All,

I am passing along something I learned yesterday about the way the folks analyzing the impacts of the proposed Delta Conveyance for the HCP and EIS are calculating compliance with D1640, specifically Delta Export/Inflow ratio to meet water quality objectives. The E/I ratio was calculated using exports estimated downstream of one of the proposed new intakes and the water diverted through that intake was not included in the export estimation. When E/I compliance is calculated this way, the operations scenarios appear to comply with the E/I objective. When estimated exports include exports through the upstream intake, apparently the E/I objective is violated.

I'm flagging this for group so we can keep track of this issue for the NEPA review and CWA 404 analysis. I believe NMFS and FWS are working on finding a solution with DWR. I came by this information through a discussion. I try to find a document or emails where the agencies explain how this happened. I'll send that along when I get it so we can all understand more clearly why this may have occurred.

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<http://www.epa.gov/region9/water/watershed/sfbay-delta/index.html>

I work a part time schedule (M 7:30a - 4:00p, T - F 7:30 - 2:00p)